

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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**Attorney for Debtor, Johnny Sanchez**

**In Re:**

**JOHNNY SANCHEZ**

**Case No.:** 17-25840

**Judge:** VFP

**Chapter:** 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following (choose one):

1.  Motion for Relief from the Automatic Stay filed by \_\_\_\_\_, creditor,

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

Certification of Default filed by Chapter 13 Trustee,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

Payments have been made in the amount of \$ \_\_\_\_\_, but have not been accounted for. Documentation in support is attached.

Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

Other (**explain your answer**):

This office represents the Debtor, who was unable to appear in our office prior to the deadline to file opposition. However, the Debtor did become current with the Trustee by paying \$749 on 8/28/20 and \$749 on 9/3/20. Proof of this payment is attached. The Debtor now owes only the September 2020 payment. We respectfully request that the Court schedule a hearing on this matter.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: September 4, 2020

/S/ David G. Beslow, Esq.  
Debtor's Signature

Date: \_\_\_\_\_

Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.

**Case Number 1725840****Debtor Information**Debtor 1 **JOHNNY SANCHEZ**

Debtor 2

**Status**

Data Last Updated Sep 03, 2020

**Trustee Information**Trustee **Marie-Ann Greenberg**

Total Paid into Plan \$26,162.00

Petition Filed on Aug 04, 2017

**Debtor's Latest****Payments**

EPAY STANDARD PLAN PAYMENT \$749.00 09/03/2020

EPAY STANDARD PLAN PAYMENT \$749.00 08/28/2020

EPAY STANDARD PLAN PAYMENT \$749.00 07/06/2020

**CASE INFORMATION**

Case Number	1725840	Filing Fee in Plan
Case Status	ACTIVE	Filing Fee Paid to Date
NDC Case Status	Active-Open	Date Petition Filed 08/04/2017
Balance on Hand	\$1,385.64	Date Plan Filed 09/08/2017
Last Receipt Date	09/03/2020	First 341 Meeting Date 09/26/2017
Last Receipt Amount	\$749.00	Date Case Confirmed 11/08/2017
Last Disbursement Date	09/03/2020	Date Case Closed
Total Paid into Plan	\$26,162.00	
Total Paid to all Parties	\$24,776.36	
Total Paid to Creditors		

**PAYMENT SCHEDULE**[Export](#)**Additional Parties In Interest****TRUSTEE INFORMATION**

Trustee Name	Marie-Ann Greenberg
Trustee City	Fairfield, NJ
Amount Paid to Date	\$1,485.49

**DEBTOR INFORMATION**

Debtor 1	JOHNNY SANCHEZ	Debtor 2
Debtor Name		Debtor Name
AKA		AKA
Direct Payment Amt	\$749.00	Direct Payment Amt
Direct Payment Frequency	MONTHLY	Direct Payment Frequency
Payroll Deduction Amt		Payroll Deduction Amt

**JUDGE/ATTORNEY INFORMATION**

Judge Name	Vincent F. Papalia
Attorney Name	GOLDMAN & BESLOW, LLC
Attorney Fee in Plan	
Attorney Paid to Date	

The values

are estimates, please contact your Attorney with any questions.

**Total Delinquency Amt: \$1,498.00**

PERIOD	DATE (MONTH/YEAR)	PAYMENT DUE	PAYMENT RECEIVED	PAYMENT DEFERRED	AMOUNT DUE
1	9/2017	\$700.00	<u>\$0.00</u>	0.00	\$700.00
2	10/2017	\$700.00	<u>\$700.00</u>	0.00	\$700.00
3	11/2017	\$705.00	<u>\$0.00</u>	0.00	\$1,405.00
4	12/2017	\$705.00	<u>\$1,410.00</u>	0.00	\$700.00
5	1/2018	\$705.00	<u>\$0.00</u>	0.00	\$1,405.00
6	2/2018	\$705.00	<u>\$0.00</u>	0.00	\$2,110.00
7	3/2018	\$705.00	<u>\$1,000.00</u>	0.00	\$1,815.00
8	4/2018	\$705.00	<u>\$1,815.00</u>	0.00	\$705.00
9	5/2018	\$705.00	<u>\$0.00</u>	0.00	\$1,410.00

PLAN STEPS	COURT DOCKET	DOCUMENTS AND FILES
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START DATE	END DATE	NUMBER OF PAY PERIODS	PAYMENT AMOUNT	PAYMENT FREQUENCY
09/01/2017	10/31/2017	2	\$700.00	MONTHLY
11/01/2017	02/28/2019	16	\$705.00	MONTHLY
03/01/2019	08/31/2022	42	\$749.00	MONTHLY